

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

CRAIG CUNNINGHAM

v.

WATTS GUERRA, LLP; et al.

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CIVIL ACTION NO. 5:22-cv-363-OLG

**AFFIDAVIT OF PAIGE BOLDT**

STATE OF TEXAS

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COUNTY OF BEXAR

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I, Paige Boldt, being duly being sworn on oath, depose, state, and declare as follows:

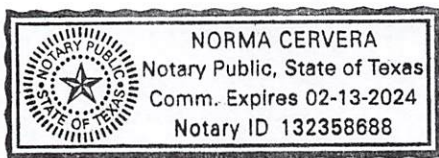
1. I am over 18 years of age, and I am of sound mind and capable of making this affidavit. I have personal knowledge of the facts stated in this affidavit and affirm that they are true and correct.
2. I am named personally as one of the defendants in the above-entitled matter.
3. I am one of the partners in Watts Guerra LLP, which is a Texas limited liability partnership. I am also one of the partners in Watts Guerra LLC, which is a limited liability company that represents mass tort cases in the United States and Puerto Rico. For purposes of this affidavit, I will refer to both firms collectively and interchangeably as "Watts Guerra," although Plaintiff in this case has named only Watts Guerra LLP as a defendant.
4. This Affidavit is submitted in support of Defendants' Motion for Summary Judgment.
5. Watts Guerra and I personally, represent thousands of clients in claims against the manufacturers of Zantac (brand name of the generic drug ranitidine) for knowingly concealing and marketing this dangerous, cancer-causing drug for over 30 years.

6. I have reviewed the affidavits of our partner Ms. Alicia O'Neill, employees Ms. Donna Coutu and Ms. Kari Archer, and the response of Berken Media to our Cease and Desist Letter. Watts Guerra has no relationship to Berken Media, Robert Kenyon, Consumer Case Helpline, or Gurusagent.com. Watts Guerra has never made any payments to any of those entities, nor has it ever received any correspondence or contracts from those companies. Further, Watts Guerra's vendors do not have a relationship with these companies.

7. Watts Guerra, and its advertising vendors, have no relationship with Berken Media, Robert Kenyon, GurusAgent.com, Susana Valenzuela, Ana Gutierrez, and Consumer Case Helpline.

Further, Affiant saith naught.

Dated this 14<sup>th</sup> day of June 2022.



A handwritten signature in black ink, appearing to be "Paige Boldt", written over a horizontal line.

Paige Boldt

Subscribed and sworn to before  
me this 14<sup>th</sup> day of June 2022.

A handwritten signature in blue ink, appearing to be "Norma Cervera", written over a horizontal line.

Notary Public – Texas  
My Commission Expires: 02-13-2024